

CARIBMAR FORWARDING COMPANY, INC

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August 29, 2003

Honorable Bryant L. Van Brakle
Secretary Federal Maritime Commission
800 North Capitol Street, N.W.
Washington, D.C. 20573



Re; Petition of Nation Customs Brokers and Forwarders Association of America, Inc.
For a Limited Exemption From Certain Tariff Requirements of the Shipping Act
Of 1984

Petition No. 03

Dear Secretary Van Brakle:

My name is Irene Reed and I am the founder and managing director of Caribmar Forwarding Co., Inc. , NVOCC license no FMC 2156, Bond No 056885. We have one office in Miami, and although we do not have offices overseas, we do have agents at our five foreign destinations.

The annual cost to us in subscribing to a tariff service is approximately \$4800. I spend approximately 12 hours a month in communications with the tariff service, in making changes, in decimating these changes to our personnel and agents, in maintaining the tariff and in checking and paying bills to the tariff service.

This is a tremendous loss of time and money for us, as we cannot pass these charges on to our clients. Since we have a tariff service, these costs cannot be passed onto persons accessing our tariff. Each time we have to file a rate in an extremely competitive market, the cost involved just makes us lose more money and more time. That time could be used constructively to help increase our business and revenue.

I know of no time that any person has accessed our tariff,

Not only is my valuable time taken up with the filings, but the traffic departments and accounting departments who actually rate the bills of ladings, who do the quotes, and who audit the bills to make certain that the rates are correct are also bogged down in this system.

I would say that approximately 8% of our company's costs are related directly or indirectly to tariff compliance.

The percentage of time that is spent in separate negotiation with shippers is approximately 10%.

We are completely and adamantly opposed to the tariff system because it is out-dated and archaic, The role of an NVO has changed vis a vis the way it negotiates rates with the steamship carriers and with the way its clients expect to negotiate rates with them. We are caught in the middle of a new way of operating and an old way of reporting. I probably have to quote 15 new rates per day and each time that is done, I have to file a new rate. Shippers and consignees now expect to negotiate rates and since contract carriage has gone into effect, unilateral rate tariffs are now out-dated. We are forced to operate in a very competitive industry showing flexibility- but with hand-cuffs on. The cost and time involved in the current maintenance of reporting and keeping tariffs has needlessly increased our costs and have reduced our ability to be competitive.

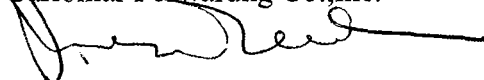
We also feel that the inordinate amount of time the FMC, with limited funds, has to spend on tariff policing has taken away time that could be spent on more important issues.

Rate tariffs are archaic, cumbersome, costly, ineffective and unwieldy. We look forward to changes that will reflect the changes in the industry in general.

I, Irene Reed, declare under penalty of perjury that the foregoing is true and correct. Further I certify that I am qualified and authorized to file this verified statement.

Executed on August 29, 2003.

Sincerely yours,
Caribmar Forwardng Co., Inc.

A handwritten signature in black ink, appearing to read 'Irene Reed', written over the printed name.

Irene Reed